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May 16, 2005

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MAY 16 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

Re: **Supplement to E911 Phase II Implementation Plan
Cellular Network Partnership, A Limited Partnership
d/b/a Pioneer Cellular**

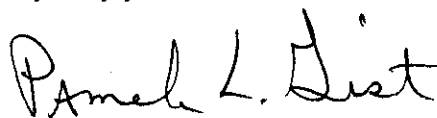
CC Docket 94-102

Dear Ms. Dortch:

On behalf of Pioneer Cellular and pursuant to Section 20.18(i) of the Commission's Rules, submitted herewith is a narrative statement regarding the companies' E911 Phase II implementation plans.

Should any questions arise with respect to this matter, please feel free to communicate directly with the undersigned.

Very truly yours,



Pamela L. Gist

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**CELLULAR NETWORK PARTNERSHIP, A LIMITED PARTNERSHIP
d/b/a PIONEER CELLULAR**

Supplemental E-911 Phase II Implementation Plan Report

Pursuant to the Commission's wireless enhanced E911 rules, this document serves as a supplemental report on Implementation Plans of Wireless E911 Phase II Automatic Location Identification for Cellular Network Partnership, A Limited Partnership d/b/a Pioneer Cellular.

Pioneer Cellular operates wireless networks in the Enid MSA and in RSAs 2, 3 and 5 in the state of Oklahoma. Pioneer Cellular's digital air interface is CDMA, with an underlying, legacy TDMA/analog network technology. This report will supplement the Commission's record with regard to Pioneer Cellular's election for providing Phase II Enhanced 911 services in its Oklahoma service areas.

Background/Contact Information

(1) Carrier Identifying Information

Legal Carrier Name

TRS/Filer Identification Number

Cellular Network Partnership, A Limited Partnership
d/b/a Pioneer Cellular

801762

Address: P.O. Box 539
108 East Robberts Avenue
Kingfisher, Oklahoma 73750

(2) Contact Information

Tony Provenzano, Switch & Data Manager
Pioneer Cellular
P.O. Box 539
108 East Robberts Avenue
Kingfisher, Oklahoma 73750
Telephone: (405) 375-0393
Facsimile: (405) 375-0623
E-Mail: ajprovenzano@ptci.com

E911 Phase II Location Technology Information for CDMA

(1) Type of Technology

Pioneer Cellular has deployed CDMA technology throughout its wireless service area in Oklahoma. Pioneer Cellular recently has concluded that handset-based technology is the more appropriate means for delivery of E911 Phase II services to users of digital handsets on Pioneer Cellular's network. Pioneer Cellular has just received its first request for Phase II services. The request is from a PSAP who is planning to become capable of receiving and utilizing Phase II data in the next few months. Pioneer Cellular has not and will not deploy a network-based solution on its TDMA/analog systems. Pioneer Cellular has concluded that it is more advantageous for customers with automatic location information ("ALI") capable handsets to have the benefit of the superior location accuracy afforded by digital handsets, rather than to rely upon the location accuracy that might be achievable using a network-based solution in Pioneer Cellular's rural service areas.

(2) Testing and Verification

Pioneer Cellular has reviewed and evaluated the test results and accompanying technical information provided by vendors of ALI-capable handsets. Pioneer Cellular, with the assistance of its consultant, Intrado, will adopt its own empirical testing and verification methods and procedures based on sound engineering and statistical practices, referring to the principles and standards set forth in OET Bulletin 71. This testing and verification will likely be incorporated into routine testing of the handset-based solution in Pioneer Cellular's service area by company technicians.

(3) Implementation Details and Schedule

- 100% of all new CDMA digital handsets activated on Pioneer Cellular's system are ALI-capable. Handset vendors have been able to supply in sufficient quantity digital phones with Phase II ALI capabilities.

- Pioneer Cellular will notify the FCC of any change in its handset-based Phase II implementation.

(4) PSAP Interface

Pioneer Cellular will work with each PSAP in its service area to mutually determine the best method of delivering Phase II information to that PSAP with the deployment of Pioneer Cellular's handset-based technology. Pioneer Cellular will deploy the necessary hardware and software changes to timely deliver the Phase II information to capable PSAPs. Where appropriate, Pioneer Cellular will work with any PSAP to convert the PSAP's interface to non-call path associated signaling ("NCAS") to accommodate the increased messaging requirements resulting from implementation of E911 capabilities.

(5) Existing Handsets

Pioneer Cellular's handset-based solution will create a Phase II capability that will provide enhanced ALI information from the commencement of implementation.

(6) Location of Non-Compatible Handsets

Pioneer Cellular will employ a handset-based solution in a manner that will ensure that E911 calls placed on handsets that are not compatible with the handset-based solution will be delivered to the PSAP with E911 Phase I information within PSAP areas that are Phase I capable. Non-subscribers to Pioneer Cellular's service with non-ALI-capable handsets roaming into a Pioneer Cellular's service area will receive Phase I capabilities within PSAP areas that are Phase I capable.

(7) Other Information

Pioneer Cellular remains dedicated to timely implementation of E911 Phase II ALI capabilities that comply with the Commission's accuracy requirements to the greatest degree technically possible. While Pioneer Cellular cannot control equipment availability, vendors' delivery schedules, LEC delays or PSAP capability, Pioneer Cellular will continue to work diligently to implement a handset-based E911 Phase II solution for its wireless network in Oklahoma.